

U.S. Environmental Protection Agency
Total Coliform Rule / Distribution System Advisory Committee

The Churchill Hotel
1914 Connecticut Ave NW
Washington, DC 20009
(202) 797-2000

May 21-22, 2008

DRAFT AGENDA

Meeting Objectives/Desired Outcomes:

- **Discuss options for revising the Total Coliform Rule, including rule construct, monitoring provisions, system categories, action levels, investigation and follow-up, and public notification, etc;**
- **Integrate proposed elements into a single draft package (possibly with variations on some elements);**
- **Discuss and reach preliminary agreement on priorities and coordination mechanisms for research and information collection concerning distribution systems; and**
- **Discuss next steps in the context of the Committee's overall time table.**

Wednesday, May 21, 2008

8:30-9:00 Arrival

9:00-9:15 Welcome, Introductions, Meeting Objectives and Agenda
Objective: Review desired outcomes, agenda and materials for this meeting.

9:15-10:30 Presentation: Overview of Current Option Packages
Objective: Review the proposed options developed so far and give an overview of the key changes from the current TCR, what would remain unchanged, commonalities and variations among these initial options and what has not yet been addressed. Understand the intended objectives or anticipated effects for each for each option package. [Discussion will follow the presentation from the technical work group.]

Overview:
Doug Owen, Malcolm Pirnie [15 min]

Options highlights and rationale:
Presenters TBD [15 min each]

10:30-10:45 Break

10:45-12:00 Presentation I and Discussion: Summary Results of Comparative Analysis for Proposed Options with Background Information Related to Options Review

Objective: Provide overview of technical presentations for this meeting, what information was available, how the analysis was constructed and why, implications for what comparison data will and will not be available, and summary comparisons of the relative implications of the proposed options.

Doug Owen and Vanessa Speight, Malcolm Pirnie [15 min]

Discussion [60 min]

- Clarification questions
- How can we interpret the data to compare the consequences and benefits of the different options? How does or doesn't the data capture the preventative consequences or benefits of the new rule construct?

12:00-1:15 Lunch (on your own, time for caucuses)

1:15-2:30 Presentation II and Discussion: Specific Comparative Analysis for Community Water Systems Serving Fewer than 1,000

Objective: Present results of options analysis for small systems making distinctions by system size and disinfection status, including systems serving less than 100, from 101-500, and from 501-1,000. Discuss and seek resolution of differences in the options that are specifically applicable to systems of this size. [Commonalities among the options will be discussed at the end of the day. Cross-cutting differences, such as sample siting plans, assessment levels or transition to the new rule, could be discussed here or tomorrow, depending on linkages with other provisions and time.]

Doug Owen and Vanessa Speight, Malcolm Pirnie [15 min]

Discussion [60 min]

- Clarification questions about the analytical data presented
- What are the pros and cons of the different proposals for baseline, repeat, additional routine and reduced monitoring provisions for CWS serving fewer than 1,000 customers? What are the important linkages to other provisions of the rule for these systems?
- What are the appropriate criteria for reduced monitoring for these systems?
- What combination of monitoring and other provisions for small CWS do members feel achieves their objectives for improving the rule?
- Discuss any other specific policy questions in addition to monitoring that apply principally to small CWS.

2:30-3:30 Presentation III and Discussion: Specific Comparative Analysis for Non-Community Water Systems Serving Less than 1,000

Objective: Present results of options analysis for both NTNCWS and TNCWS. Discuss and seek resolution of differences in the options that are specifically applicable to these types of systems. [Commonalities among the options will be discussed at the end of the day. Cross-cutting differences, such as sample siting plans, assessment levels or transition to the new rule, could be discussed here or tomorrow, depending on linkages with other provisions and time.]

Doug Owen and Vanessa Speight, Malcolm Pirnie [15 min]

Discussion [45 min]

- Clarification questions about the analytical data presented
- What are the unique characteristics of non-community water systems that need to be taken into account in make decisions about rule options?
- What are the pros and cons of the different proposals for baseline, repeat, additional routine and reduced monitoring provisions for small NTNCWS and TNCWS? What are the important linkages to other provisions of the rule for these systems?
- What are the appropriate criteria for reduced monitoring for these systems?
- What should be the provisions for seasonal systems?
- What combination of monitoring and other provisions for small NCWS do members feel achieves their objectives for improving the rule?
- Discuss other policy questions that apply principally to small NTNCWS and TNCWS.

3:30-3:45 Break

3:45-4:45 Presentation IV and Discussion: Specific Comparative Analysis for Community Water Systems Serving More than 1,000

Objective: Present results of options analysis for larger systems, making distinctions between systems of different sizes. Discuss and seek resolution of differences in the options that are specifically applicable to systems of this size. [Commonalities among the options will be discussed at the end of the day. Generally applicable issues such as sample siting plans, assessment levels or transition to the new rule, could be discussed here or tomorrow, depending on linkages with other provisions and time.]

Doug Owen and Vanessa Speight, Malcolm Pirnie [15 min]

Discussion [45 min]

- Clarification questions
- Where do the proposed option packages vary with respect to larger community water systems, and how can these differences best be resolved?

4:45-5:15 Public Comment

5:15-6:00 General Discussion: Starting a “Single-Text” Option Package

Objectives: Identify what is common in the proposed options and any preliminary agreements reached during the day (e.g. routine, repeat, additional routine and reduced monitoring). Confirm those that can be included in a draft, integrated option package for further discussion. [Members may take a short caucus before deciding, if requested.]

Discussion:

- General observations about the current option packages
- Confirm commonalities and any agreements reached earlier in the day (e.g. monitoring, other?)

6:00-7:00 Working Dinner (*depending on logistics*)

[NOTE: Discussion of commonalities in TCR options will continue until a decision is made as whether these can be included in a draft “single text” option or remaining issues are clarified and a plan for resolving them is developed.]

7:00-8:00 Discussion: Implementation Mechanism for Research and Information Collection

Objective: Discuss possible approaches for implementing the information collection and research needs recommendations, including time table, roles, approaches, etc.

8:00-9:00 Discussion: Information Collection and Research Priorities

Objectives: Decide some or all knowledge gaps to include in the draft agreement in principle and/or identify next steps to complete recommendations.

Thursday, May 22, 2008

8:00-8:30 Arrival

8:30-8:45 Review Today’s Agenda

Objective: Reflections on Day One discussions and review desired outcomes, agenda and materials for this meeting. Review and approve February meeting summary.

8:45-10:15 General Discussion: Creating a “Single-Text” TCR Option Package [continued]

Objectives: Identify remaining differences, discuss pros and cons of the proposals, and seek agreement. Includes report from FAC subgroup on assessments and corrective action, what constitutes a violation, public notification, transition provisions from current rule, etc.

Suggested Discussion Questions

[unless agreements were reached on day one]

- What are the appropriate levels for assessment? How many levels and with what degree of detail?

- Who should do the assessments at each level?
- What should the trigger(s) be for a level two assessment?
- What should be the policy with respect to corrective actions? Who has the authority to make determinations at different levels? What appeal provisions are appropriate?
- What should be the timing for assessments and corrective action?
- What should be defined as a violation under the new TCR?
- What should the public notification requirements be?
- What should be the provisions for transition from the current TCR to a new rule?
- What should be the criteria and elements for sample siting plans?
- Other (operator training, etc)

10:15-10:30 Break

11:00-12:15 General Discussion: Creating a “Single-Text” TCR Option Package *[continued]*
Objectives: Continue discussion of remaining differences, discuss pros and cons of the proposals, and seek agreement.

12:15-1:15 Working Lunch (*check what’s possible with hotel*)

1:15-2:30 General Discussion: Creating a “Single-Text” TCR Option Package *[continued]*

2:30-3:00 Recap and Discuss Next Steps
Objective: Summarize decisions made and issues remaining. Discuss the structure of and approach/timing for drafting the agreement in principle document, and implications for remaining meetings.

3:00 Adjourn

NOTE: This draft agenda was prepared by the facilitators for review by the Total Coliform Rule Distribution System Advisory Committee. The Total Coliform Rule Distribution System Advisory Committee is a federal advisory committee chartered by Congress, operating under the Federal Advisory Committee Act (FACA; 5 U.S.C., App.2). The committee provides advice to the Administrator of the U.S. Environmental Protection Agency on revisions to the Total Coliform Rule (TCR), and on what information about distribution systems is needed to better understand the public health impact from the degradation of drinking water quality in distribution systems. The findings and recommendations of the Committee do not represent the views of the Agency, and this document does not represent information approved or disseminated by EPA.